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April 6, 2020

Via CM/ECF

The Honorable Katherine Polk Failla
United States District Court
Southern District Of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Cara Nasisi et al. v. Comprehensive Health Management, Inc.*
Case No. 1:19-cv-4132-KPF
Joint Request for Further Extension of Time

Dear Judge Failla:

On November 18, 2019, the Court issued an Order on the parties' Agreed Motion to Conditionally Certify a Narrowed Class and Approve Notice to Potential Plaintiffs in the Collective. *See* Dkt. No. 73. In that Order, the Court ordered that the parties file a Supplemental Proposed Civil Case Management Plan and Scheduling Order within 120 days of entry of the order, i.e., by Monday, March 16th. On Friday, March 13th, this Court granted an extension of time to file the Supplemental Proposed Civil Case Management Plan and Scheduling Order through Monday, March 30th as the joint request of the parties. *See* Dkt. No. 96. On Friday, March 27th, this Court granted a further extension of time through April 6th, also at the parties' joint request. *See* Dkt. No. 98.

The parties have now reached an agreement to mediate this case and selected a private mediator. They intend to engage in informal discovery prior to mediation limited to payroll and timekeeping data and other information needed for evaluation of settlement value. The parties have not selected a mediation date but based on the need to exchange and review data prior to mediation and travel restrictions related to the COVID-19 public health crisis, they anticipate that mediation will occur in August or early September.

In order to minimize legal costs prior to mediation, the parties desire not to engage in discovery other than that necessary for settlement purposes, as outlined above. Accordingly, they jointly request that all formal discovery be stayed pending mediation and that the Court set a date

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for submission of a joint status report and/ or a supplemental case management plan and scheduling order after completion of mediation.

No other scheduled dates will be impacted by the requested extension of time. The parties again appreciate the Court's consideration of this request.

Jointly and respectfully submitted,

/s/ Philip A. Goldstein

Philip A. Goldstein

Counsel for Defendant

/s/ Maureen A. Salas

Maureen A. Salas

Counsel for Plaintiffs

cc: All Counsel of Record via CM/ECF

SO ORDERED:

Date: _____

Hon. Katherine Polk Failla